



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

MYNOR ESAU JANDRES FLORES,

Defendant.

Case No. 1:21-CR-168

STATEMENT OF FACTS

The United States and the defendant, MYNOR ESAU JANDRES FLORES, agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. The defendant is a national and citizen of El Salvador and does not have United States citizenship or any lawful status in the United States.
2. On or about October 3, 2013, the defendant was removed from the United States pursuant to a final, valid order of removal at or near Dallas, Texas.
3. Sometime after the defendant's October 3, 2013 removal, the defendant voluntarily and illegally reentered the United States.
4. On or about November 21, 2013, the defendant was removed from the United States pursuant to a final, valid order of removal at or near San Antonio, Texas.
5. Sometime after the defendant's November 21, 2013 removal, the defendant voluntarily and illegally reentered the United States.
6. On or about April 28, 2014, the defendant was removed from the United States pursuant to a final, valid order of removal at or near Laredo, Texas.
7. Sometime after the defendant's April 28, 2014 removal, the defendant voluntarily

and illegally reentered the United States.

8. On or about April 4, 2017, the defendant was removed from the United States pursuant to a final, valid order of removal at or near Laredo, Texas.

9. Sometime after the defendant's April 4, 2017 removal, the defendant voluntarily and illegally reentered the United States.

10. On or about May 8, 2020, the defendant was removed from the United States pursuant to a final, valid order of removal at or near Alexandria, Louisiana.

11. Sometime after the defendant's May 8, 2020 removal, the defendant voluntarily and illegally reentered the United States.

12. On or about May 19, 2021, the defendant was found in the United States by immigration authorities in or near Loudoun County, Virginia, within the Eastern District of Virginia.

13. Prior to his re-entry into the United States, the defendant had not obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to reapply for admission to the United States.

14. This statement of facts includes those facts necessary to support the plea of guilty by the defendant. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

15. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Raj Parekh

Acting United States Attorney

Date: August 10, 2021

By: /s/

Colin P. Norton

Special Assistant United States Attorney

Marc J. Birnbaum

Assistant United States Attorney

DEFENDANT'S STIPULATION AND SIGNATURE

After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.




MYNOR ESAU JANDRES FLORES
DEFENDANT

Date: 10/29/21

DEFENSE COUNSEL'S SIGNATURE

I am Ann Rigby, the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Ann Rigby
Assistant Federal Public Defender
Attorney for MYNOR ESAU JANDRES FLORES

Date: 10/29/21